

# **EXHIBIT 1**

# **EXHIBIT 1**

**Caleb L. Green**

---

**From:** Caleb L. Green  
**Sent:** Tuesday, September 5, 2023 3:47 PM  
**To:** 'Eric Ball'; Molly Melcher; Anthony Fares; Kimberly Culp; msmart@fennemorelaw.com  
**Cc:** Steven A. Caloiaro; Ashley B. Moretto  
**Subject:** RE: EXTERNAL: RE: Meet and Confer - Yuga Labs, Inc. v. Hickman, Case No. 2:23-cv-00111-JCM-NJK

Eric,

Regarding your first request, those discussions were for purposes of entering a stipulation to vacate the default judgment. Unless you are going to respond to the revisions we made to the draft stipulation to vacate default judgment that I sent to you on August 30, 2023, we have nothing further to discuss on the matter.

Concerning the judgment, please explain how enforcing a judgment this soon would not violate FRCP 62(a). We intend to file a motion to stay any enforcement of the default judgment shortly if the parties cannot reach a stipulation pending the outcome of the motion to lift the default judgment.

I look forward to your prompt response.

Caleb

---

**From:** Eric Ball <eball@fenwick.com>  
**Sent:** Tuesday, September 5, 2023 9:41 AM  
**To:** Caleb L. Green <CGreen@dickinson-wright.com>; Molly Melcher <mmelcher@fenwick.com>; Anthony Fares <AFares@fenwick.com>; Kimberly Culp <KCulp@fenwick.com>; msmart@fennemorelaw.com  
**Cc:** Steven A. Caloiaro <SCaloiaro@dickinson-wright.com>; Ashley B. Moretto <AMoretto@dickinson-wright.com>  
**Subject:** RE: EXTERNAL: RE: Meet and Confer - Yuga Labs, Inc. v. Hickman, Case No. 2:23-cv-00111-JCM-NJK

Caleb,

Following up on our discussions, please identify what Yuga Labs NFT(s) Mr. Hickman claims to own and identify the wallets associated with that ownership. As we noted, Mr. Hickman has continually failed to provide any confirmation of his purported ownership despite his discovery obligations to do so.

Separately, we have not heard from you regarding Mr. Hickman's payment of the Judgment. A Rule 60 motion does not affect the judgment's finality or suspend its operation. If we do not hear from you by the end of the day regarding payment, we will proceed ahead with enforcing the Judgment against Mr. Hickman's assets.

Eric Ball

Fenwick | Partner | 650-335-7635 | [eball@fenwick.com](mailto:eball@fenwick.com)